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08 CV 02359 PKL

Attorneys for Plaintiff,  
James N. Hood as Liquidating Trustee of the  
Oceantrade Corporation Liquidating Trust

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JAMES N. HOOD AS LIQUIDATING TRUSTEE  
OF THE OCEANTRADE CORPORATION  
LIQUIDATING TRUST,

Plaintiff,  
-against-  
  
**AFFIDAVIT  
IN SUPPORT  
OF ATTACHMENT**

ASIABULK INC. a/k/a ASIA BULK INC. and  
IMC SHIPPING CO. PTE. LTD.,

Defendants.

STATE OF NEW YORK )  
 ) ss:  
COUNTY OF NEW YORK )

James H. Hohenstein, being duly sworn, deposes and says:

1. I am a member of the firm of Holland & Knight LLP, attorneys for plaintiff James N. Hood as Liquidating Trustee of the Oceantrade Corporation Liquidating Trust, and I am duly admitted to practice before the United States District Court for the Southern District of New York.

2. I am familiar with the facts and circumstances underlying this dispute and I am submitting this affidavit in support of the Verified Complaint and the Writ of Attachment.

3. Defendants Asiabulk Inc. a/k/a Asia Bulk Inc. ("Asiabulk") and IMC Shipping Co. Pte. Ltd. ("IMC") are not listed in the telephone directory of the principal metropolitan areas in this district, nor are they listed in the Transportation Tickler, a recognized commercial directory in the maritime industry.

4. Our office contacted the Secretary of State for the State of New York and was advised that Asiabulk and IMC are not New York business entities, nor are they foreign business entities authorized to do business in New York.

5. To the best of my information and belief, defendants Asiabulk and IMC cannot be found within this district or within the State of New York.

6. Based upon the facts set forth in the Verified Complaint, I respectfully submit that the defendants Asiabulk and IMC are liable to Plaintiff for the damages alleged in the Verified Complaint, which amounts, as best as can be presently determined, to a total of \$60,326.80.

7. Upon information and belief, defendants Asiabulk and IMC have property, goods, chattels or effects within this jurisdiction, to wit: funds or accounts held in the name(s) of

Asiabulk Inc. and/or Asia Bulk Inc. and/or IMC Shipping Co. Pte. Ltd. at one or more of the following financial institutions:

ABN Amro Bank

American Express Bank

Banco Popular

Bank of America, N.A.

Bank of China

Bank Leumi USA

The Bank of New York

BNP Paribas

Calyon Investment Bank

Citibank, N.A.

Commerzbank

Deutsche Bank Trust Company Americas

HSBC Bank USA, N.A.

JPMorgan Chase Bank, N.A.

Standard Chartered Bank

Société Générale

UBS AG

Wachovia Bank, N.A.

China Trust Bank

Great Eastern Bank

Industrial Bank of Korea

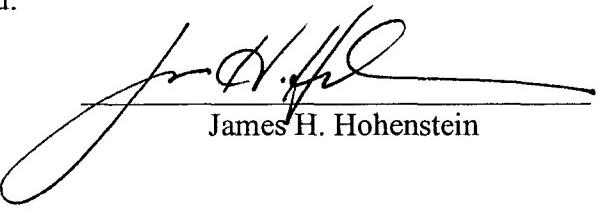
Nara Bank

Shin Han Bank

United Orient Bank

8. Plaintiff is, therefore, requesting that this Court, pursuant to Rule B(1) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, issue a writ of maritime attachment for an amount up to \$60,326.80.

**WHEREFORE**, Plaintiff respectfully requests that the application for a writ of maritime attachment and garnishment be granted.



James H. Hohenstein

Sworn to before me this  
5<sup>th</sup> day of March, 2008



DIALYZ E. MORALES  
Notary Public

# 5167375\_v1

DIALYZ E. MORALES  
Notary Public, State Of New York  
No. 01MO6059215  
Qualified In New York County  
Commission Expires June 25, 2007